

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

VOLTERRA SEMICONDUCTOR  
LLC,

Plaintiff,

v.

MONOLITHIC POWER SYSTEMS,  
INC.,

Defendant.

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)  
) Redacted - Public Version  
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)

) C.A. No. 19-2240-CFC-SRF  
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**DEFENDANT'S CONCISE STATEMENT OF FACTS IN SUPPORT OF ITS  
MOTION FOR SUMMARY JUDGMENT (NO. 1) OF NO INDIRECT  
INFRINGEMENT BASED ON**

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Dated: November 19, 2021

Exhibit	Description	Pages
Exhibit 1		1 (entirety)
Exhibit 2	Volterra's Proposed Amended Infringement Contentions dated June 16, 2021. D.I. 166, Ex. R (Sealed).	1-41
Exhibit 3	October 11, 2021 Letter from MPS to Volterra	1-6 (entirety)
Exhibit 4	November 1, 2021 Letter from Volterra to MPS	1-2 (entirety)

1. [REDACTED]

[REDACTED] Ex. 1. In particular, [REDACTED]

[REDACTED] *Id.*

2. [REDACTED]

[REDACTED] Ex. 1.

3. [REDACTED]

[REDACTED] Ex. 1.

4. Volterra's proposed amended infringement contentions allege that the

[REDACTED] Ex. 2 at 4 ('986), 10 ('408), 17 ('955).

5. In Volterra's proposed amended infringement contentions, Volterra alleges that MPS is liable for indirect infringement based on direct infringement of all Asserted Patents by [REDACTED]. In particular, for each

of the Asserted Patents, Volterra alleges, [REDACTED]

[REDACTED] and 2) MPS “induces” “this direct infringement” [REDACTED]

[REDACTED]. Ex. 2 at 6-7 (’986), 12-13 (’408), 19 (’955).

6. Regarding inducement of all three Asserted Patents, Volterra alleges in its proposed amended infringement contentions that MPS induced direct infringement in part by “[REDACTED]

[REDACTED]” among other things.

Ex. 2 at 7 (’986), 13 (’408), 19 (’955).

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**CERTIFICATE OF COMPLIANCE WITH STANDING ORDER  
REGARDING BRIEFING**

I hereby certify that the foregoing complies with the typeface requirements and word limits of Paragraph 20(c) of the Scheduling Order entered in this case (D.I. 69). This brief has been prepared in 14-Point Times New Roman and contains 387 words, excluding the cover page, signature block, and this certificate of compliance.

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**CERTIFICATE OF SERVICE**

I, Nathan R. Hoeschen, hereby certify that on November 19, 2021,  
this document was served on the persons listed below in the manner indicated:

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